

GA appointed

M10- 688

JAP:TJS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

BOUKARI SAAM,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

ANDREW KAPPAUF, being duly sworn, deposes and states that he is a Special Agent with United States Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about June 15, 2010, within the Eastern District of New York and elsewhere, defendant BOUKARI SAAM did knowingly, intentionally and unlawfully import into the United States from a place outside thereof heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. At approximately 1:32 p.m. on June 15, 2010, defendant BOUKARI SAAM arrived at John F. Kennedy International Airport in Queens, New York, aboard Delta Airlines Flight No. 9856 from Accra, Ghana.

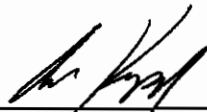
2. During an examination, a Customs and Border Protection Inspector noticed that defendant BOUKARI SAAM appeared unusually nervous and gave inconsistent answers to routine customs questions. Specifically, the defendant initially stated, in sum and substance, that he was a rice farmer in Togo. He stated that he had taken a bus from Togo to Ghana and later stated that he'd taken a car to Ghana, not a bus. He initially stated that he purchased his airline ticket himself. He later stated that his brother in New York had purchased his ticket. He finally stated that his wife and sister in Chicago had purchased the ticket. He stated that he'd arrived in Ghana the same day as his flight to the United States. However, his passport had a Ghanaian stamp indicating that he'd arrived in Ghana three days prior to his flight.

3. The defendant was presented with an x-ray consent form, which he read, appeared to understand and signed. The defendant BOUKARI SAAM was transported to the medical facility at John F. Kennedy International Airport, where an x-ray was taken of defendant's intestinal tract, which was positive for foreign bodies. On June 15, 2010 at approximately 9:15 p.m.,

the defendant passed 11 pellets, one of which field-tested positive for the presence of heroin. The defendant was then placed under arrest.

5. Defendant BOUKARI SAAM will be detained at the JFK medical facility until such time as he has passed all the pellets contained within his intestinal tract.

WHEREFORE, your deponent respectfully requests that defendant BOUKARI SAAM be dealt with according to law.



ANDREW KAPPAUF
Special Agent
Immigration and Customs
Enforcement

Sworn to before me this
16th day of June, 2010

GE